IN THE UNITED STATE DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THE ESTATE OF VIVIAN MAIER, Plaintiff, vs. JEFFREY GOLDSTEIN, an individual, VIVIAN MAIER PRINTS, INC., a Delaware corporation, Defendants.	))))))))))))	Case No. 17-cv-2951 JURY TRIAL DEMANDED

PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER

Pursuant to Federal Rule of Civil Procedure 65, Plaintiff the Estate of Vivian Maier respectfully requests that the Court enter: (1) an *ex parte* temporary restraining order preventing the transfer of original works created by Vivian Maier, as well as copies and instruments of infringement in the Defendants' possession, custody, or control (2) an *ex parte* temporary restraining order pursuant to 17 U.S.C. § 503 seizing and placing into the custody of the Court all film negatives, prints, and digitized versions of Maier works in Defendants' possession, custody, or control from which copies of Maier works could be made; (2) an *ex parte* temporary restraining order freezing Defendants' assets; and (3) an order for expedited discovery allowing the Estate to inspect and copy Defendants' records relating to their holdings and exploitation of Maier works.

The grounds for this motion are more particularly set forth in the accompanying Memorandum of Law in Support of Plaintiff's Motion for Preliminary Injunction, the Verified Complaint, and the Declaration of James E. Griffith.

WHEREFORE Plaintiff the Estate of Vivian Maier respectfully moves the Court to grant its motion and enter an order:

(1) preventing the transfer of counterfeit copies, instruments of infringement, and any other materials whose transfer would irreparably disturb the status quo and deprive the Estate of a crucial remedy;

(2) requiring Defendants to deposit with the Court all film negatives, prints, and digitized versions of Maier works in Defendants' possession, custody, or control from which copies of Maier works could be made;

(3) preventing the fraudulent transfer of assets so that the Estate's right to an equitable accounting of Defendant's profits from sales of counterfeit Maier works is preserved;

(4) granting the Estate's request for expedited discovery; and

(5) granting such other and further relief as the Court deems necessary under the circumstances.

Dated: April 20, 2017

/s/ James E. Griffith

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that I caused the foregoing to be electronically filed with the Court using CM/ECF which will send notification of such filing to all counsel of record.

/s/James E. Griffith